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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN and JANE DOE I, Guardians Ad Litem
for JOANN DOE I, a minor, individually and
on behalf of all those similarly situated, and
JOHN and JANE DOE II, Guardians Ad Litem
for JOANN DOE II, a minor, individually and
on behalf of all those similarly situated;

Plaintiffs,

vs.

JEREMIAH MAZO; CLARK COUNTY
SCHOOL DISTRICT; DOES 1 through 20;
DOE 1 through 20; ROE CORPORATIONS 1
through 20;

Defendants.

Case No. 2:16-cv-00239-APG-PAL

**[PROPOSED] STIPULATION AND
ORDER TO CONTINUE DISCOVERY
(SECOND REQUEST)**

The parties have reached an agreement to attend mediation and to delay the limited remaining depositions in this case until after the mediation has taken place. In light of this agreement, Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A MINOR (collectively, "Plaintiffs"), Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD") and Defendant JEREMIAH MAZO, by and through their respective counsel of record, hereby jointly submit this proposed stipulation extending certain case deadlines for the approval of the Court.

STIPULATION

Pursuant to Local Rule 6-1, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, CCSD, and Jeremiah Mazo that the current deadlines be extended in the above referenced matter.

The current deadlines are as follows:

Discovery Cut-Off Date:	January 29, 2018
Dispositive Motions:	February 28, 2018
Proposed Joint Pretrial Order:	March 28, 2018 or 30 days after the Court rules on any dispositive motions.

I. Background

This case was filed on February 5, 2016, alleging abuse of students by a former CCSD teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

II. Discovery Completed

Plaintiffs have served Defendant Clark County School District with the following discovery to date:

1. Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 10/10/2016;
2. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of Production of Documents served 10/27/16;

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3. Plaintiffs' First Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 12/14/2016;
4. Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
5. Plaintiff Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
6. Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
7. Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to Clark County School District's First set of Request for Production of Documents served 12/14/2016;
8. Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
9. Plaintiff Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
10. Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;
11. Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses to Clark County School District's First set of Request for Production of Documents served 12/14/2016;
12. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for Production of Documents served 01/18/2017;
13. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Requests for Admission served 01/18/2017;
14. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Interrogatories served 01/18/2017;

15. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Interrogatories served 01/18/2017;
16. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Requests for Admission served 01/18/2017;
17. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for Production of Documents served 01/20/2017;
18. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of Interrogatories served 01/23/2017;
19. Plaintiffs' Second Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 02/10/17;
20. Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of Interrogatories served on 03/01/17;
21. Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of Interrogatories served on 03/01/17;
22. Plaintiffs' Third Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 05/31/17;
23. Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 07/07/17;
24. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of Interrogatories to CCSD served 07/11/17;
25. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of Interrogatories to CCSD served 08/22/17;
26. Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 10/11/17;
27. Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.

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Defendant Clark County School District has served Plaintiffs with the following discovery to date:

1. CCSD's Initial Disclosures served 10/05/2016;
2. CCSD's First set of Interrogatories to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I served 11/14/2016;
3. CCSD's First set of Interrogatories to Plaintiff Joann Doe I served 11/14/2016;
4. CCSD's First set of Interrogatories to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I served 11/14/2016;
5. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe I, as Guardians ad Litem for Joann Doe I served 11/14/2016;
6. CCSD's First set of Interrogatories to Plaintiff Jane Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
7. CCSD's First set of Interrogatories to Plaintiff Joann Doe II served 11/14/2016;
8. CCSD's First set of Interrogatories to Plaintiff John Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
9. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe II, as Guardians ad Litem for Joann Doe II served 11/14/2016;
10. CCSD's Responses to Plaintiffs' First set of Requests for Production of Documents to the Clark County School District served 12/01/2016;
11. CCSD's First Supplemental Disclosures served 12/01/2016;
12. CCSD's Second Supplemental Disclosures served 02/17/17;
13. CCSD's Third Supplemental Disclosures served 02/24/17;
14. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;
15. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;

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- 1 16. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 2 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 3 17. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a
- 4 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 5 18. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 6 Minor's Second set of Interrogatories to CCSD served 03/10/17;
- 7 19. CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant
- 8 to March 6, 2017 Order served 04/05/17;
- 9 20. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 10 Minor's Third set of Interrogatories to CCSD served 07/24/17;
- 11 21. CCSD's Fourth Supplemental Disclosures served 08/21/17;
- 12 22. CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a
- 13 Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
- 14 23. CCSD's Sixth Supplemental Disclosures served 09/01/2017;
- 15 24. CCSD's Seventh Supplemental Disclosures served 10/13/17;
- 16 25. CCSD's Expert Witness Disclosures served 10/13/17.

17 **The following depositions have been completed to date:**

- 18 1. Ulandra Barnett
- 19 2. Ivy Burns
- 20 3. Sylvia Glass
- 21 4. Jennifer Mattiello
- 22 5. Nestor Mattiello
- 23 6. Jon Okazaki
- 24 7. Julia Pettit
- 25 8. Kristopher Pettit
- 26 9. Christine Prosen
- 27 10. Darrin Puana

11. Billie Rayford

III. Discovery That Remains to be Completed

1. Deposition of Defendant Jeremy Mazo;
2. Depositions of Plaintiffs Joann Doe I and Joann Doe II;¹ and
3. Expert Depositions.

IV. Basis for Extension

The parties request this extension to allow the depositions of Joann Doe I, Joann Doe II, Jeremy Mazo, and the parties' expert witnesses to take place after a mediation, which the parties are currently seeking to schedule for March. The parties have diligently engaged in discovery and believe that allowing these final depositions to take place following the mediation will further mediation discussions. The parties have agreed on a mediator. However, the agreed upon mediator has limited availability and the parties are unable to schedule the mediation until March or April of 2018. The parties are committed to completing the mediation by April 13, 2018, if at all possible. Accordingly, the parties request an extension to allow for the foregoing outstanding discovery to be completed 60 days from the anticipated completion of mediation (April 13, 2018) as detailed below.

V. Proposed Modification

Based on the foregoing, the parties jointly seek a modification of the current deadlines as follows:

1. **Current Deadlines:**

Discovery Cut-Off Date:	January 29, 2018
Dispositive Motions:	February 28, 2018
Proposed Joint Pretrial Order:	March 28, 2018 or 30 days after the Court rules on any dispositive motions.
2. **Proposed Deadlines:**

Discovery Cut-Off Date:	June 12, 2018
Dispositive Motions:	July 12, 2018

¹ Defendants have expressed a desire to conduct the depositions of Joann Doe I and Joann Doe II, who are both minors. Plaintiffs hereby reserve the right to object to such depositions from going forward.

Proposed Joint Pretrial Order:

**August 10, 2018 or 30 days
after the Court rules on any
dispositive motions.**

3. This request is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

Dated this 28th day of December, 2017.

Dated this 28th day of December, 2017.

GREENBERG TRAURIG, LLP

EGLET PRINCE

/s/ Kara B. Hendricks

/s/ Artemus W. Ham

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Dated this 28th day of December, 2017.

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ORDER

IT IS HEREBY ORDERED.

DATED this 23rd day of February, 2017.


UNITED STATES MAGISTRATE JUDGE